

From: [Sirak, Reed](#)
To: [Kuss, Hala](#)
Cc: [Demma, Carlo](#); [Russell, Tess](#); [Schulz, Natalie](#); [W Michael Oberfield](#)
Subject: RE: US EPA - Renergy 1/13 Meeting Follow-up
Date: Monday, February 28, 2022 4:21:39 PM
Attachments: [ATT00001.txt](#)

Dear Ms. Kuss,

On January 20, 2022, US EPA issued the following deadlines with respect to the supplemental information request dated January 14, 2022 sent via email:

- a. For items 6, 7, 9, and 10, which correspond, respectively, to Information Requests, 25, 25 (sic), and 18, please let us know by January 28, 2022, whether Renergy has information responsive to these requests.
- b. For item 9, which corresponds to Information Request 26, please let us know by January 28, 2022, whether Renergy has information responsive to this request beyond what it has already provided.
- c. To the extent Renergy has information responsive to items 6, 7, and 10 and/or additional information responsive to item 9, please provide it as it is gathered, but by no later than February 28, 2022.
- d. Please provide information responsive to items 1, 2, 3, 4, 5, 8, 11, and 12 as it is available, but by no later than February 28, 2022.

Renergy provided confirmation regarding “a.” and “b.” above via email on January 28, 2022.

In compliance with “c.” and “d.” above, Renergy provides the following narrative responses to items 1-12 as stated in US EPA’s email dated January 14, 2022:

1. Describe the engine rebuild project at Emerald. What were the approximate start and end dates of the project?

Renergy’s Response: The engine was sent to be overhauled on July 15, 2021. The overhaul included major lower and upper internal engine components. The overhaul also included the rebuild of the electrical generation head. This work is scheduled to be completed on or about March 30, 2022. Responsive documentation was uploaded to the corresponding folder in the data room (“2.28.22 Submittal Deadline” folder” inside the “Q 1 - Emerald Engine Rebuild” folder).

2. Describe any projects or cleanouts of the anaerobic digester or engine at Dovetail. Why is there no data reported for Dovetail in the Heat Content and Energy Generation spreadsheet for July 2020 through September 2021? If cleanouts or other projects caused an interruption to operations, please provide the duration.

Renergy’s Response: There is no data to report from July 2020 to September 2021 due to digester cleanout and re-seeding. The duration of the re-seed remains ongoing due to the suboptimal levels of gas production at the facility. The terms “cleanout” and “re-seed” refer to emptying the digester of its material for a fresh material restart of the digester. Discontinuation of biosolids processing at

Dovetail was part of the reason for the cleanout and re-seed. Re-seeding the digester takes time to build the strength of the bacteria in the tank. The Dovetail digester is fully operational at this time but is still in the re-seed phase, as you must slowly build bacteria strength to accept full permitted volumes of material without damaging the biology of the digester. Responsive documentation was uploaded to the corresponding folder in the data room ("2.28.22 Submittal Deadline" folder" inside the "Q 2 - Dovetail Cleanout" folder).

3. There are numerous days in which the difference between two consecutive days' engine Run Hours is above 24 hours. For example, see Response #4, Emerald: the difference between "Run Hours" for August 7, 2018 and August 6, 2018 is 34 hours. Please explain how the engine's Run Hours can exceed the number of hours in one day. If necessary, provide updated spreadsheets for both facilities with correct engine Run Hours.

Renergy's Response: The reading on the meter is done at various times of day. If, for example, you take a reading at 6am on a Monday and then again at 12pm on Tuesday, you might see 30 hours of run time on a single date. No updated spreadsheets are necessary and no documentation responsive to this request was uploaded to the data room.

4. In the spreadsheet titled "13 Heat Content", please advise as to whether the value for March 2020 for Dovetail is a typo. We believe the value for Flare Hours was provided instead of the Minimum Heat Content value.

Renergy's Response: The information for March 2020 was a typo. The value should have been "642.36". An updated report was uploaded to the corresponding folder in the data room ("2.28.22 Submittal Deadline" folder" inside the "Q 4 - Heat Content" folder).

5. Please send EPA the operating manual for the Sewerin Multitec 545 monitor and provide EPA documentation required by the permit that this continuous monitoring device meets or exceeds the requirements of performance specification 5 at 40 CFR Part 60, Appendix B, to ensure conformance of the CEMS to the specification. Please also supply the calibration Drift (CD) and Relative accuracy (RA) tests required in section 13 of performance specification 5 to EPA, along with the supporting documentation. Please let EPA know if Renergy plans to continue using the gas monitoring device at the Emerald facility into the future after the aforementioned engine rebuild is complete. Confirm which monitor Emerald is currently using to measure H₂S levels. If not using the Sewerin monitor, please provide the manual for the monitor being used.

Renergy's Response: The Operating Manual was uploaded to the corresponding folder in the data room. The calibration was last completed November 25, 2021 and the next calibration is scheduled for November of 2022. The 2021 Calibration Report was also uploaded to the corresponding folder in the data room ("2.28.22 Submittal Deadline" folder" inside the "Q 5 - Operating Manual" folder). Emerald is using the Sewerin for gas quality monitoring and will most likely to continue with it when the engine is reinstalled following the rebuild.

6. According to the permit in section A.3, Renergy is required to retain all records required by

the-permit for five years from the date the record was created. Please provide to EPA the weekly data for the Dovetail Facility that was gathered with the Landtec Biogas 5000, for hydrogen sulfide concentrations at the flare.

Renergy's Response: H2S levels are entered into the daily worksheet for both Dovetail and Emerald. Results were loaded to the corresponding folder in the data room. ("2.28.22 Submittal Deadline" folder" inside the "Q - Weekly Landtec Data" folder)

7. According to the permit in section A.3, Renergy is required to retain all records required by the permit for five years from the date the record was created. Please provide to EPA the continuous data for the Emerald Facility that was gathered with the Sewerin Multitec 545, for hydrogen sulfide concentrations at the flare.

Renergy's Response: H2S levels are entered into the daily worksheet for both Dovetail and Emerald. Results were loaded to the corresponding folder in the data room ("2.28.22 Submittal Deadline" folder" inside the "Q 7 - Sewerin Multitec 545 Data" folder).

8. Provide any documentation Renergy has kept regarding the de minimis status of the sludge lagoons at both Emerald and Dovetail.

Renergy's Response: Renergy has engaged a consultant to provide assistance in responding to Request 8 - De Minimis Status of the Sludge Lagoons at Emerald and Dovetail. It is anticipated that a supplemental response will be provided regarding Dovetail in approximately 21 days. Emerald will take longer given the limited resources available. Renergy will provide an update regarding Emerald when it submits the Dovetail analysis. No information responsive to this request was uploaded to the data room.

9. Provide the Annual Permit Evaluation Reports for both Emerald and Dovetail for the last five years, as requested in the original information request. The current submission for Emerald has the same document for 2020 and 2021 and does not have the complete past five years for either Emerald or Dovetail.

Renergy's Response: These reports were uploaded to the corresponding folder in the data room ("2.28.22 Submittal Deadline" folder" inside the "Q 9 - Annual Permit Evaluation Rpts Dovetail - Emerald" folder).

10. Regarding the response to Information Request #18, Renergy is required by 40 CFR Part 63, Subpart ZZZZ, to keep records of how the company maintains and operates the engines. Please submit the Operation and Maintenance Plan or similar document to EPA, along with the initial notification of engine rebuild at the Emerald facility.

Renergy's Response: This information was uploaded to the corresponding folder in the data room ("2.28.22 Submittal Deadline" folder" inside the "Q 10 - 40 CFR Part 63, Subpart ZZZZ Docs" folder).

11. Are there scheduled stack tests for the engines at Emerald and Dovetail? If yes, when?

Renergy's Response: Dovetail successfully completed a stack test in January of 2022. The stack test report was uploaded to the corresponding folder in the data room ("2.28.22 Submittal Deadline" folder" inside the "Q 11 - Stack Test" folder). The last stack test at Emerald was performed on March 26, 2019. This stack test report was uploaded to the corresponding folder in the data room. No stack tests are currently scheduled for either Emerald or Dovetail at this time.

12. Please provide a response to Information Request #21, as initially required by the information request letter.
- a. What's the capacity of each flare at Dovetail and Emerald?
 - b. If Renergy does not regularly monitor the average mass flow rate of the Vent Gas to the flare, how does each facility ensure each flare's capacity is not being breached?
 - c. Provide the calculation of each flare's exit velocity. Provide the calculation of each flare's Vmax (maximum velocity).
 - d. Provide the corresponding calculations of the monthly Methane % (used in the calculation for net heating value, Response #22) for each month in 2020.
 - e. Provide a narrative explaining how Dovetail and Emerald calculate Net Heating Value in accordance with 40 CFR Part 60.18, as required by each facility's permit, as shown in the calculation of net heating value provided in Response #22.
 - i. Provide documentation or evidence of Renergy's determination that the net heating value of methane (BTU/scf) is 1011 BTU/scf.

Renergy's Response: Uploaded to the data room ("2.28.22 Submittal Deadline" folder" inside the "Q 12 - Flare Info" folder). Renergy has been unable to access a confirmed / technical flare capacity for either Emerald or Dovetail. We are working to rectify this issue with the original EPC contractor on both projects. The flares were purchased as part of the initial EPC package at both Emerald and Dovetail. From a practical standpoint, the flares have always been able to process 100% of generated methane even in the event the engine is not utilizing methane simultaneously.

Finally, let me stress to you that Renergy will continue to fully cooperate with the US EPA. If you require any additional information, documentation, or clarification, please do not hesitate to contact me directly. Renergy will respond as promptly and completely as is possible. Thank you.

Reed

Reed W. Sirak

Associate

Real Estate & Environmental

Ph: 216.363.6256

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From: Sirak, Reed <RSirak@beneschlaw.com>

Sent: Friday, January 28, 2022 3:06 PM

To: Kuss, Hala <Kuss.Hala@epa.gov>

Cc: Demma, Carlo <Demma.Carlo@epa.gov>; Russell, Tess <Russell.Tess@epa.gov>; Schulz, Natalie <Schulz.Natalie@epa.gov>; W Michael Oberfield <wmoberfield@renergy.com>

Subject: RE: US EPA - Renergy 1/13 Meeting Follow-up

Dear Ms. Kuss,

US EPA requested that Renergy confirm whether it has information responsive to requests 6, 7, 8, 9 and 10 listed in the correspondence below by January 28, 2022. This email serves as Renergy response to the January 28, 2022 deadline.

Since the January 13, 2022 meeting with US EPA, Renergy examined its records to determine whether it has information responsive to requests 6, 7, 8, 9 and 10. Renergy answers as follows:

6. According to the permit in section A.3, Renergy is required to retain all records required by the permit for five years from the date the record was created. Please provide to EPA the weekly data for the Dovetail Facility that was gathered with the Landtec Biogas 5000, for hydrogen sulfide concentrations at the flare.

Renergy's Response: Yes, based on Renergy's internal review, it believes that it has additional documentation responsive to Request 6. Renergy will upload the additional documentation to the data room on or before February 28, 2022. To clarify, the Dovetail air permit was issued on April 9, 2018. Prior to April 9, 2018, Renergy operated under the August 23, 2013 Air Permit Exemption issued by the Regional Air Pollution Control Agency, which is attached to this correspondence for EPA's review.

7. According to the permit in section A.3, Renergy is required to retain all records required by the permit for five years from the date the record was created. Please provide to EPA the continuous data for the Emerald Facility that was gathered with the Sewerin Multitec 545, for hydrogen sulfide concentrations at the flare.

Renergy's Response: Yes, based on Renergy's internal review, it believes that it has additional documentation responsive to Request 7. Renergy will upload the additional documentation to the data room on or before February 28, 2022. To clarify, the Emerald air permit was issued on November 11, 2018. November 11, 2018, Renergy operated under the May 31, 2012 Air Permit Exemption issued by the Ohio Environmental Protection Agency, which is attached to this correspondence for EPA's review.

8. Provide any documentation Renergy has kept regarding the de minimis status of the sludge lagoons at both Emerald and Dovetail.

Renergy's Response: No, Renergy does not believe that it has information regarding the de minimis status of the sludge lagoons at both Emerald and Dovetail. Renergy did however have a verbal conversation with Heather Kawecky of RAPCA during which Renergy discussed this issue.

9. Provide the Annual Permit Evaluation Reports for both Emerald and Dovetail for the last five years, as requested in the original information request. The current submission for Emerald has the same document for 2020 and 2021 and does not have the complete past five years for either Emerald or Dovetail.

Renergy's Response: Yes, based on Renergy's internal review, it believes that it has additional documentation responsive to Request 9. Renergy will upload the additional documentation to the data room on or before February 28, 2022.

10. Regarding the response to Information Request #18, Renergy is required by 40 CFR Part 63, Subpart ZZZZ, to keep records of how the company maintains and operates the engines. Please submit the Operation and Maintenance Plan or similar document to EPA, along with the initial notification of engine rebuild at the Emerald facility.

Renergy's Response: Yes, based on Renergy's internal review, it believes that it has additional documentation responsive to Request 10. Renergy will upload the additional documentation to the data room on or before February 28, 2022.

Renergy appreciates EPA's willingness to grant it additional time to upload the requested information. Renergy will continue to work diligently to ensure that EPA receives the requested information. Please confirm at your earliest convenience that Renergy has access to the data room.

Do not hesitate to contact me directly with any questions, comments, or concerns.

Thank you,

Reed

Reed W. Sirak

Associate

Real Estate & Environmental

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From: Kuss, Hala <Kuss.Hala@epa.gov>

Sent: Thursday, January 20, 2022 6:21 PM

To: Sirak, Reed <RSirak@beneschlaw.com>

Cc: Demma, Carlo <Demma.Carlo@epa.gov>; Russell, Tess <Russell.Tess@epa.gov>; Schulz, Natalie <Schulz.Natalie@epa.gov>; W Michael Oberfield <wmoberfield@renergy.com>

Subject: RE: US EPA - Renergy 1/13 Meeting Follow-up

Hello Reed,

Exemption 7(a) [REDACTED] Regarding your request for additional time to provide the information sought in the second set of items, 1-12:

- a. For items 6, 7, 9, and 10, which correspond, respectively, to Information Requests, 25, 25, and 18, please let us know by January 28, 2022, whether Renergy has information responsive to these requests.

- b. For item 9, which corresponds to Information Request 26, please let us know by January 28, 2022, whether Renergy has information responsive to this request beyond what it has already provided.
- c. To the extent Renergy has information responsive to items 6, 7, and 10 and/or additional information responsive to item 9, please provide it as it is gathered, but by no later than February 28, 2022.
- d. Please provide information responsive to items 1, 2, 3, 4, 5, 8, 11, and 12 as it is available, but by no later than February 28, 2022.

Thank you.

Hala

Hala Kuss
Associate Regional Counsel
Office of Regional Counsel (C-14J)
United States Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

From: Sirak, Reed <RSirak@beneschlaw.com>
Sent: Thursday, January 20, 2022 1:30 PM
To: Schulz, Natalie <Schulz.Natalie@epa.gov>; W Michael Oberfield <wmoberfield@renergy.com>
Cc: Kuss, Hala <Kuss.Hala@epa.gov>; Demma, Carlo <Demma.Carlo@epa.gov>; Russell, Tess <Russell.Tess@epa.gov>
Subject: RE: US EPA - Renergy 1/13 Meeting Follow-up

All,

Thank you for the email below. Renergy completed its preliminary assessment of the information below. **Exemption 7(a)**

After careful consideration, Renergy requests an additional 30 days from January 28, 2022 to respond to the questions 1-12 below. An additional 30 days is reasonable for the following reasons: (1) the people primarily responsible for responding to these questions are out of the office until February 1, 2022; (2) Renergy is working diligently with limited resources to submit an application for a Land Application Management Plan (LAMP) at Emerald and a No Biosolids Determination Letter for Dovetail as soon as possible to Ohio EPA; and (3) the recent COVID surge has impacted Renergy's ability to completely and accurately respond to EPA's supplemental information request. An additional 30 days from January 28, 2022 is reasonable under these circumstances.

Exemption 7(a)

Exemption 7(a)

Please answer the following questions, as discussed in the meeting today:

1. Describe the engine rebuild project at Emerald. What were the approximate start and end dates of the project?
2. Describe any projects or cleanouts of the anaerobic digester or engine at Dovetail. Why is there no data reported for Dovetail in the Heat Content and Energy Generation spreadsheet for July 2020 through September 2021? If cleanouts or other projects caused an interruption to operations, please provide the duration.
3. There are numerous days in which the difference between two consecutive days' engine Run Hours is above 24 hours. For example, see Response #4, Emerald: the difference between "Run Hours" for August 7, 2018 and August 6, 2018 is 34 hours. Please explain how the engine's Run Hours can exceed the number of hours in one day. If necessary, provide updated spreadsheets for both facilities with correct engine Run Hours.
4. In the spreadsheet titled "13 Heat Content", please advise as to whether the value for March 2020 for Dovetail is a typo. We believe the value for Flare Hours was provided instead of the Minimum Heat Content value.
5. Please send EPA the operating manual for the Sewerin Multitec 545 monitor and provide EPA documentation required by the permit that this continuous monitoring device meets or exceeds the requirements of performance specification 5 at 40 CFR Part 60, Appendix B, to ensure conformance of the CEMS to the specification. Please also supply the calibration Drift (CD) and Relative accuracy (RA) tests required in section 13 of performance specification 5 to EPA, along with the supporting documentation. Please let EPA know if Renergy plans to continue using the gas monitoring device at the Emerald facility into the future after the aforementioned engine rebuild is complete. Confirm which monitor Emerald is currently using to measure H₂S levels. If not using the Sewerin monitor, please provide the manual for the monitor being used.
6. According to the permit in section A.3, Renergy is required to retain all records required by the-permit for five years from the date the record was created. Please provide to EPA the weekly data for the Dovetail Facility that was gathered with the Landtec Biogas 5000, for hydrogen sulfide concentrations at the flare.
7. According to the permit in section A.3, Renergy is required to retain all records required by the permit for five years from the date the record was created. Please provide to EPA the continuous data for the Emerald Facility that was gathered with the Sewerin Multitec 545, for hydrogen sulfide concentrations at the flare.
8. Provide any documentation Renergy has kept regarding the de minimis status of the sludge lagoons at both Emerald and Dovetail.
9. Provide the Annual Permit Evaluation Reports for both Emerald and Dovetail for the last five years, as requested in the original information request. The current submission for Emerald has the same document for 2020 and 2021 and does not have the complete past five years for either Emerald or Dovetail.
10. Regarding the response to Information Request #18, Renergy is required by 40 CFR Part 63, Subpart ZZZZ, to keep records of how the company maintains and operates the engines.

Please submit the Operation and Maintenance Plan or similar document to EPA, along with the initial notification of engine rebuild at the Emerald facility.

11. Are there scheduled stack tests for the engines at Emerald and Dovetail? If yes, when?
12. Please provide a response to Information Request #21, as initially required by the information request letter.
 - a. What's the capacity of each flare at Dovetail and Emerald?
 - b. If Renergy does not regularly monitor the average mass flow rate of the Vent Gas to the flare, how does each facility ensure each flare's capacity is not being breached?
 - c. Provide the calculation of each flare's exit velocity. Provide the calculation of each flare's Vmax (maximum velocity).
 - d. Provide the corresponding calculations of the monthly Methane % (used in the calculation for net heating value, Response #22) for each month in 2020.
 - e. Provide a narrative explaining how Dovetail and Emerald calculate Net Heating Value in accordance with 40 CFR Part 60.18, as required by each facility's permit, as shown in the calculation of net heating value provided in Response #22.
 - i. Provide documentation or evidence of Renergy's determination that the net heating value of methane (BTU/scf) is 1011 BTU/scf.

Please provide us this information by Friday, January 28, 2022. I will be reopening your access to the OneDrive folder to submit the response, same as the submittal for the original Information Request. If you encounter difficulties in gathering this information by the deadline, please contact me or Hala Kuss at kuss.hala@epa.gov.

Thank you,

Natalie Schulz

Environmental Engineer

Air Enforcement and Compliance Assurance Branch

U.S. EPA, Region 5

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Office: (312)886-2776